

Hon. Jamal N. Whitehead

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

| | | |
|-----------------------------------|---|--|
| JOSHUA A. DIEMERT, an individual, |) | |
| |) | Civil Action No. 2:22-cv-01640-JNW |
| Plaintiff, |) | |
| |) | |
| v. |) | JOINT MOTION FOR EXTENSION |
| |) | OF PRETRIAL DATES |
| THE CITY OF SEATTLE, a municipal |) | |
| corporation, |) | |
| |) | Note on motion calendar Dec. 11, 2024 |
| Defendant. |) | |
| |) | |
| |) | |

1. The Parties jointly move the Court for an extension of time in which to complete certain pretrial tasks set out in the Court's Order Setting Trial Date and Related Dates (ECF No. 49) and others set by Local Civil Rule 16.

2. Trial is set to begin January 13, 2025. *See* Order (ECF No. 49).

3. The pretrial conference is set for January 6, 2025. *See id.*

4. The deadline for Plaintiff to serve his pretrial statement on Defendant was November 25, 2024. Plaintiff did not serve his pretrial statement until December 5, 2024. The pretrial statement Plaintiff served was not in final form. It contains over 500 exhibits, including one exhibit totaling 9,000 pages. Plaintiff has agreed to create a revised version of his pretrial

1 statement that complies with Rule 16 and reflects only those exhibits he reasonably intends to
2 use at trial. Plaintiff has agreed to serve Defendant with same by December 17, 2024.

3 5. The case schedule deadline for Defendant to serve its response to Plaintiff's
4 pretrial statement was December 10, 2024. To mitigate the prejudice to Defendant, the Parties
5 have agreed that Defendant should have ten days to respond to Plaintiff's revised pretrial
6 statement.

7 6. Consistent with their agreement, the Parties request that the deadline for
8 Defendant to serve its response to Plaintiff's revised pretrial statement be extended to December
9 27, 2024, the deadline for the Parties to confer regarding the pretrial statement be extended to
10 December 31, and the deadline for the Parties to file the Pretrial Statement with the Court be
11 extended to January 6, 2024.

12 7. The Parties further request that the deadline for deposition designations be
13 extended 7 days, so that any designations are due December 30, 2024.

14 8. The Court recently extended the deadline for motions in limine by 12 days, so
15 that motions are due December 16, 2024. *See* Order (ECF No. 87). No extension of this deadline
16 is requested.

17 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

18 Respectfully submitted this 11th day of December, 2024.

PACIFIC LEGAL FOUNDATION
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ORDER

PURSUANT TO STIPULATION IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

HON. JAMAL WHITEHEAD
UNITED STATES DISTRICT JUDGE